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Attorneys for Complainant

**BEFORE THE
PHYSICAL THERAPY BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

SAEEDAH HARWOOD PAYROVY

26347 W. Thousand Oaks Blvd., #170
Calabasas, CA 91302

622 Riverstone Lane #170
Oak Park, CA 81377

Physical Therapist Assistant Approval No. AT
2966

Respondent.

Case No. 1D200162852

OAH No. L-2002050740

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

IT IS HEREBY STIPULATED AND AGREED by and between the parties to the
above-entitled proceedings that the following matters are true:

PARTIES

1. Steven K. Hartzell (Complainant) is the Executive Officer of the Physical
Therapy Board of California. He brought this action solely in his official capacity and is
represented in this matter by Bill Lockyer, Attorney General of the State of California, by Taylor
Schneider, Deputy Attorney General.

2. Saeedeh Harwood Payrov (Respondent) is representing herself in this
proceeding and has chosen not to exercise her right to be represented by counsel.

3. On or about January 7, 1993, the Physical Therapy Board of California issued Physical Therapist Assistant Approval No. AT 2966 to Respondent. The Physical Therapist Assistant Approval was in full force and effect at all times relevant to the charges brought, and will expire on November 30, 2002, unless renewed.

JURISDICTION

4. Accusation No. 1D200162852 was filed before the Physical Therapy Board of California (Board), Department of Consumer Affairs, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on March 21, 2002. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of Accusation No. 1D200162852 is attached as Exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

5. Respondent has carefully read, and understands the charges and allegations in Accusation No. 1D200162852. Respondent has also carefully read, and understands the effects of this Stipulated Settlement and Disciplinary Order.

6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in Accusation No. 1D200162852.

9. Respondent agrees that her Physical Therapist Assistant Approval is

1 subject to discipline and she agrees to be bound by the Board's imposition of discipline as set
2 forth in the Disciplinary Order below.

3 **CONTINGENCY**

4 10. This stipulation shall be subject to approval by the Physical Therapy Board
5 of California. Respondent understands and agrees that counsel for Complainant and the staff of
6 the Physical Therapy Board of California may communicate directly with the Board regarding
7 this stipulation and settlement, without notice to or participation by Respondent. By signing the
8 stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek
9 to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails
10 to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary
11 Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal
12 action between the parties, and the Board shall not be disqualified from further action by having
13 considered this matter.

14 11. The parties understand and agree that facsimile copies of this Stipulated
15 Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same
16 force and effect as the originals.

17 12. In consideration of the foregoing admissions and stipulations, the parties
18 agree that the Board may, without further notice or formal proceeding, issue and enter the
19 following Disciplinary Order:

20 **DISCIPLINARY ORDER**

21 IT IS HEREBY ORDERED that Saeedeh Harwood Payrov, holder of Physical
22 Therapy Assistant Approval No. 2966, shall be publicly reprimanded by the Physical Therapy
23 Board of California, pursuant to Business and Professions Code sections 2660, subsection (d),
24 and 2661, as set forth in Exhibit B (a copy of which is attached hereto and hereby incorporated
25 by reference as if fully set forth).

26 **ACCEPTANCE**

27 I have carefully read the Stipulated Settlement and Disciplinary Order. I
28 understand the stipulation and the effect it will have on my Physical Therapy Assistant Approval.

1 I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and
2 intelligently, and agree to be bound by the Decision and Order of the Physical Therapy Board of
3 California.

4 DATED: August 11, 2002.

5
6 Original Signed By:
7 SAEDEH HARWOOD PAYROVY
8 Respondent
9

10 ENDORSEMENT

11 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully
12 submitted for consideration by the Physical Therapy Board of California of the Department of
13 Consumer Affairs.

14
15 DATED: August 15, 2002.

16
17 BILL LOCKYER, Attorney General
18 of the State of California
19

20 Original Signed By:
21 TAYLOR SCHNEIDER
22 Deputy Attorney General
23 Attorneys for Complainant

24 DOJ Docket Number: 03575160-LA02 0345
25 Stipulation 8/31/01
26
27
28

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DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Physical Therapy Board of California, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on October 28, 2002.

It is so ORDERED September 27, 2002.

Original Signed By: Donald Chu, PhD, PT
FOR THE PHYSICAL THERAPY BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS

Exhibit A
Accusation No. 1D200162852

LETTER OF REPRIMAND

Respondent's California Physical Therapy Assistant Approval Number AT 2966 is publicly reprovved pursuant to Business and Professions Code sections 2660, subsection (d), and 2661, in that Respondent was convicted by a plea of no contest to one count of theft, a misdemeanor, in violation of Penal Code section 484(a).

Exhibit B

Letter of Reprimand